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ENCL. #3

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II

DATE: NOV 09 1998

SUBJECT: Review of Roosevelt Roads Draft RFI Report for Operable Units 3 and 5

FROM: Leon Lazarus, Environmental Scientist *LL*  
Hazardous Waste Support Section (2DESA-HWSB)

TO: Tim Gordon, Environmental Engineer  
Caribbean Section (2DEPP-RPB)

I have reviewed the March 20, 1998 draft RFI Report for Roosevelt Roads Operable Units 3 and 5 located in Ceiba, Puerto Rico. The document was prepared by Baker Environmental. Our ESAT contractor reviewed the analytical deliverables and data validation reports. My comments are as follows:

1. The analytical deliverables, analytical results, and data validation reports are acceptable.
2. The Office of Solid Waste recently modified the 1994 Revised Interim Soil Lead Guidance for CERCLA sites and RCRA Corrective Action Facilities (EPA-540-F-98-030, August 1998). We recommend that you ascertain if the lead regulatory action levels in the RFI report are appropriate.
3. Contaminant concentrations in SWMUs 1 and 2 that exceed regulatory action levels are considered inconsequential in the RFI Report. For example, Table 5-21 for SWMU 2 shows 4 out of 8 arsenic soil samples exceed the industrial RBC, and 7 out of 8 arsenic soil samples exceed the residential RBC. However, the RFI Report recommends land use restrictions instead of remediation for SWMUs 1 and 2. Clarification should be provided as to why remediation for contaminated areas within SWMUs 1 and 2 is not recommended.
4. We agree with the recommendation to perform a Corrective Measures Study on SWMU 45.

If you have any questions, or require further information, please contact me at 732-321-6778.

cc: Robert Runyon, 2DESA-HWSB  
Ray Basso, 2DEPP-RPB  
Nicki Diforte, 2DEPP-RPB